

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE		
	Plaintiff,	C.A. NO: 02-CV-4440
v.		
TRANS UNION LLC CITY OF PHILADELPHIA	Defendant.	

**TRANS UNION LLC'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE REPLY TO OPPOSITION
TO MOTION FOR SUMMARY JUDGMENT**

Trans Union LLC, by and through its undersigned attorneys, moves, unopposed, for an extension of time to file a Reply to Plaintiff's Opposition to Motion for Summary Judgment, and states as follows:

1. On June 25, 2003, the Court granted the parties' stipulation that Plaintiff file an Opposition to Trans Union's Motion for Summary Judgment on or before July 10, 2003. Plaintiff filed her opposition on that date.
2. The stipulation required Trans Union to file its Reply thereto by July 21, 2003.
3. Plaintiff's opposition to summary judgment is 51 pages, longer than counsel for Trans Union anticipated.
4. Lead counsel for Trans Union, Bruce S. Luckman, Esq., left for vacation on July 18, and is scheduled to return on August 3. Trans Union would be greatly prejudiced were it required to file its reply without opportunity for its lead trial counsel to prepare the final version.
5. Accordingly, in the interests of justice, Trans Union respectfully requests an extension of time until August 6, 2003, for Trans Union to file its Reply.

6. Counsel for Trans Union has conferred with counsel for Plaintiff, and Plaintiff does not oppose this motion.

WHEREFORE, Defendant Trans Union respectfully requests an extension of time until Wednesday, August 6, 2003 to file its Reply to Plaintiff's Opposition to Trans Union's Motion for Summary Judgment.

Respectfully Submitted,

SATZBERG, TRICHON,
KOGAN & WERTHEIMER, P.C.

MARK E. KOGAN (10186)
BRUCE S. LUCKMAN (38636)
TIMOTHY P. CREECH (81728)

1818 Market St., 30th Floor
Philadelphia, PA 19103
(215) 575-7600; Fax: (215) 575-7688

*Counsel for Defendant,
Trans Union LLC*

DATED: July 21, 2003